



January 29, 1992

Reply to
Attn. of: HW-104

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ed Ryf
Plant Manager
Pacific Wood Treating Corporation
111 W. Division Street
P.O. Box 158
Ridgefield, Washington 98642

Re: Visual Site Inspection at Pacific Wood Treating Corporation
(Ridgefield Brick and Tile Site - EPA ID# WAD009036906)

Dear Mr. Ryf:

Per your conversation with Kathryn Gladden of SAIC/TSC on January 17, 1992, this letter is to confirm a visual site inspection (VSI) of the Pacific Wood Treating Corporation (Ridgefield Brick and Tile Site) at 3510 NW 289th Street, Ridgefield, Washington, on February 21, 1992, beginning at 10:00 a.m.

The VSI will be performed by SAIC/TSC, a contractor to the U.S. Environmental Protection Agency (EPA). SAIC/TSC is an authorized contractor of EPA (Contract No. 68-W9-0008) and is acting as field investigators for EPA. The SAIC/TSC investigators may be accompanied by representatives from EPA, the responsible state agency, or both.

This VSI is intended to meet the requirements of two hazardous waste programs administered by EPA, as described below:

1. SUPERFUND: Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9604(e) authorizes EPA to gain access to, and request information from, sites where any hazardous substances or pollutants or contaminants may have been generated, stored, treated, disposed of, or transported from.

EPA Region 10 and the Department of Ecology identified Pacific Wood Treating Corporation during preliminary assessment screening as a site which requires additional information to accurately profile the nature and extent of past waste disposal activity at the site.

Pacific Wood Treating Corporation will be inspected to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at this location.



Enclosed is a CERCLA Information Needs checklist. You must provide the information outlined in the checklist within 30 days of your receipt of this letter, or at the time of the VSI (whichever is later). Failure to do so may subject the facility to enforcement action under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e)(5). Such enforcement action could include the assessment of penalties up to \$25,000 per day of noncompliance. Pursuant to Section 103 of CERCLA, 42 U.S.C. § 9603, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable, or falsify, any of the requested records.

2. RCRA: The Hazardous and Solid Waste Amendments of 1984 (HSWA) establish the authority in the Resource Conservation and Recovery Act (RCRA) program to address releases of hazardous waste or hazardous constituents, including those from solid waste management units (SWMUs). This program applies to operating, closed, or closing RCRA treatment, storage or disposal facilities. The RCRA Facility Assessment (RFA) is a mechanism which the EPA utilizes to carry out the corrective action authorities of HSWA.

Specifically, the RFA is the initial step in the corrective action process. In the RFA, EPA identifies all SWMUs at a facility and determines the potential for releases of waste from the units. The corrective action authorities allow the RCRA program to detect and correct releases from regulated waste management units as well as those units resulting from past waste management practices at RCRA - regulated facilities. Releases to all media (air, soils, and surface and ground waters) from all waste units are within the jurisdiction of the RCRA corrective action program. EPA is currently responsible for implementing this program in Washington, Oregon, and Alaska; Idaho is authorized to implement its own corrective action program.

EPA is currently conducting a RFA for the Pacific Wood Treating Corporation facility.

Section 3007 of RCRA, 42 U.S.C. § 6927, authorizes EPA to request certain information from handlers of hazardous waste. Pursuant to § 3007 of RCRA (and to facilitate the RFA process) a list of the information you are to provide to the inspectors is enclosed. The title of the list is RCRA Information Needs. All facility records must be reviewed in obtaining the requested information, including the personal recollections of longtime employees and past owners and operators. The requested information must be ready for the inspection team at the time of the VSI, or submitted within 30 days of your receipt of this letter (whichever is later).

Failure to provide the requested information within the specified time frame may subject the facility to enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. Such enforcement action could include the assessment of substantial penalties, up to \$25,000 per day of noncompliance.

The information must be delivered to SAIC at the VSI, or if the VSI is less than 30 days from your receipt of this letter, delivered to SAIC at the following address:

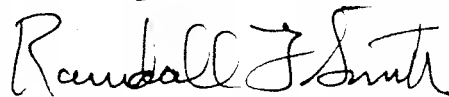
Kathryn Gladden
SAIC/TSC
18702 North Creek Parkway, Suite 211
Bothell, Washington 98011

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. See, 41 Fed. Reg. 36902-36925 (September 1, 1976), as amended by 43 Fed. Reg. 40000 (September 8, 1978), 44 Fed. Reg. 17673 (March 23, 1979), 48 Fed. Reg. 11270 (March 17, 1983) and 50 Fed. Reg. 61661 (December 18, 1985). For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.200. The information will be disclosed only to the extent, and by means of, the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice to you.

An agenda for the VSI is enclosed; including a schedule, a preliminary list of SWMUs and areas of concern identified during our file review to be inspected, and lists of RCRA and CERCLA information needs for you to provide to the inspection team. We will be contacting you in the next two weeks to confirm the inspection and make any necessary final arrangements.

If you have any questions regarding this letter or the RFA process, please contact Marcia Bailey (RCRA Site Manager) of my staff at (206) 553-0684.

Sincerely,



Randall F. Smith, Acting Director
Hazardous Waste Division

Enclosures

cc: K. Gladden, SAIC/TSC

ATTACHMENT I
RCRA FACILITY ASSESSMENT
VISUAL SITE INSPECTION AGENDA

FACILITY: Pacific Wood Treating Corporation (Ridgefield Brick and Tile Site)

EPA ID NO.: WAD009036906

FACILITY CONTACT: Ed Ryf
Plant Manager

EPA/CONTRACTOR/STATE PERSONNEL:
Marcia Bailey, EPA
Stuart Strum, SAIC/TSC

PURPOSE OF INSPECTION

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the scope of EPA's authority under RCRA by requiring corrective action for releases of hazardous wastes and hazardous constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action.

In addition, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9604(e), a preliminary assessment (PA) is performed to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at a facility.

Both processes include a preliminary review of available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit.

The purpose of the VSI is to:

- * Identify solid waste management units (SWMUs) and other areas of concern. A SWMU is defined as any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.
- * Interview site representatives and review or collect facility information provided by site representatives.
- * Perform a site walk-through and visual inspection with the site representative.
- * Take photographs of the site, including photographs of all SWMUs and other areas of concern.

PROPOSED VSI SCHEDULE

Introductory Meeting

Inspection team will meet with Pacific Wood Treating Corporation personnel to discuss:

- * Purpose of visit
- * Agenda
- * Safety and health considerations
- * Facility history and operations
- * Additional information needs pertaining to the SWMUs identified during the preliminary review including processes which may result in the generation of waste streams.

Inspection Tour

The inspection team will tour the facility and examine potential SWMUs and areas of concern, listed below, identified during the preliminary file review. Additional SWMUs and areas of interest will be identified during the inspection, based on the team's tour and review of the facility information.

SWMUs AND AREAS OF CONCERN PREVIOUSLY IDENTIFIED:

SWMU 1 - Landfill

Closing Meeting

The inspection team will meet with Pacific Wood Treating Corporation personnel to conclude the VSI activities.

ATTACHMENT II

RCRA INFORMATION NEEDS

1. Provide a detailed topographic map of the facility.
2. Provide a map which identifies the location of facility property boundaries and all SWMUs. (at a scale of 1"= 200')
3. Submit any available information that identifies all past activities of owners/lessors prior to Pacific Wood Treating Corporation at this site which involved generation, treatment, or storage of wastes. Provide types of wastes generated, treated, or stored, and disposition of all wastes, if known.
4. Provide information on solid and hazardous wastes disposed of in the landfill (SWMU 1). Include types of waste, waste composition (analytical data, if available), dates when wastes were disposed of, and quantities of wastes disposed.
5. Information on ground water monitoring (including installation of monitoring wells, water level data and sample analyses) and site geology and hydrology collected subsequent to the preparation of the following reports:
 - Progress Report Geological and Groundwater Site Characterization and Groundwater Monitoring, September 27, 1987, David J. Newton and Associates.
 - Groundwater Monitoring Report for the Ridgefield Brick and Tile Site, Ridgefield, Washington, December 27, 1988, David J. Newton and Associates.
6. Information on any modification or addition to containment structures at the site, including runoff/runoff controls, cap, leachate collection and management, and any changes in containment at the landfill site (SWMU 1) since the issuance of the Report on Certification of Closure of the Ridgefield Brick and Tile Site, Ridgefield, Washington, prepared by Sweet-Edwards and Associates, 1984.
7. Information on any operation and maintenance activities at the site, including maintenance and repair of the landfill cap and leachate collection system, leachate management activities, analyses of leachate samples and any additional waste management activities at the site.
8. For any additional current or former SWMUs at the facility that are not included in the list on Page 2, provide the following information:

- (a) Unit description:
 - Location
 - Construction details
 - Engineering drawings (as built, if available)
 - Capacity
 - (b) Dates of operation.
 - (c) Operational status (active, inactive, closed).
 - (d) Waste types, quantities, sources, and disposition.
 - (e) Release controls.
 - (f) History of leaks, spills, or other uncontrolled releases.
 - (g) Description of inspection and maintenance procedures to assure integrity of the unit.
9. Provide current and historical aerial photographs of the facility, if available.

CERCLA INFORMATION NEEDS

1. General Information

- Site Name
- Street Address
- Phone Number
- Name of parent company, if any
- Previous property/facility owners
- Names
- Addresses
- Years of ownership
- Total area of site (in acres)
- Description of site security, if any (i.e., fenced, patrolled, etc.)
- Description of land uses immediately surrounding the site boundaries
- Water supply source(s)

2. Site Map with the Following Items Identified

- All waste storage/disposal areas (buildings, ponds piles, etc.), including SWMUs.
- Well locations (production wells, monitoring wells, abandoned wells).
- Site entrance locations.
- Building names and their general functions.
- Outside process areas.
- Storage tanks (above and below ground, size, contents)
- Waste treatment systems (if present).

3. Waste Summary

- Waste types generated or stored on site (e.g., sludge, solvents, pesticides, acids, bases, etc.)
- Chemical constituents of each waste (if known).
- Feedstocks containing hazardous materials.
- Type of storage and/or final disposition (i.e., landfilled on site, transported from site by recycling firm, etc.)
- Volumes of each waste type generated annually and total volume present on site.
- Description of any waste treatment systems (i.e., flocculation/ filtration, incinerators, chemical/physical treatment, volume reduction, etc.)
- Names of waste transporters/recyclers, and the time period they have been used.

4. List of Permits and Applications, including permit #, date of issue, and expiration date (i.e., NPDES, UIC, air, RCRA, SPCC Plan, state, local, etc.)

5. Past/Present Sampling/Monitoring Activities:

- Summary of sampling/monitoring programs

- Hydrogeological studies prepared for the Pacific Wood Treating Corporation (Ridgefield Brick and Tile Site).